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Co-Tenants Lillian Logan, Cornell Rd LLC,  
Christiana LLC, and Alexander LLC

UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF OREGON

In re

15005 NW Cornell LLC; and  
Vahan M. Dinihanian, Jr. ,

Debtors.

Bankruptcy Case Nos.

Case No. 19-31883-dwh11 (Lead Case)  
19-31886-dwh11

Jointly Administered Under Case No.  
19-31883-dwh11

**DECLARATION OF DANIEL  
STEINBERG IN SUPPORT OF LOGAN  
PARTIES EMERGENCY MOTION TO  
CONTINUE HEARING ON DEBTORS'  
JOINT MOTION TO OBTAIN CREDIT**

I, Daniel L. Steinberg, am one of the attorneys for Creditors, Interested Parties and Co-Tenants, Lillian Logan, Cornell Rd LLC, Christiana LLC, and Alexander LLC (the "Logan Parties"). I make this declaration based on my own personal knowledge, and if called as a witness, to testify to the matters contained herein.

1. Shortly after the original hearing date on the Debtors' Joint Motion for Authority to Obtain Credit, I corresponded with attorney Douglas Pahl regarding whether the Debtors would be willing to produce documents without the time and expense of formal discovery.
2. Attached hereto as Exhibit 1 is a copy of that correspondence.

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SUPPORT OF LOGAN PARTIES EMERGENCY MOTION  
TO CONTINUE HEARING ON DEBTORS' JOINT  
MOTION TO OBTAIN CREDIT—

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3. As of March 1, 2022, I have received no documents from the Debtors, nor any further communication regarding the requested documents.

4. On February 27, 2022, I began having trouble speaking after recovering from a cold. By February 28, 2022, I had, for all practical purposes, lost my voice. As a result, I am unable to effectively participate in an evidentiary hearing. My partner, Russell Garrett, is a bankruptcy trustee in Vancouver, Washington and is scheduled to conduct 341a meetings on March 2, 2022.

5. At noon on February 28, 2022, I sent a message to Nicholas Henderson requesting a telephone conference. In the email, I explained that I had laryngitis and that I may be difficult to understand on the phone. Shortly after that, Mr. Henderson and I spoke on the phone. I explained that the Logan Parties were going to request a continuance of the hearing set for March 2, 2022, due to the Debtors' failure to provide discovery and my inability to effectively participate in the hearing due to laryngitis. I then asked if the Debtors would consent.

6. Mr. Henderson told me that Douglas Pahl was taking the lead on these motions and that, given my laryngitis, he would call Mr. Pahl to get the Debtors' formal position on a continuance of the hearing. At 6:44 p.m. on February 28, 2022, Mr. Henderson sent a message informing me that the Debtors intended to go forward with the hearing on March 2, 2022.

7. LAC Tree Farms, LLC, the current holder of the debt secured by 15005 NW Cornell Rd. LLC's interest in the Cornell property has agreed to continue the foreclosure sale currently set for March 9, 2022, until a period of at least one week after a rescheduled hearing on the Debtors' Joint Motion for Authority to Obtain Credit. This assumes that the hearing is set not less than nine weeks from March 2, 2022.

8. The interest rate on the current debt secured by the Debtors in the Cornell property is 4.5 %. The interest on the loan sought by the Debtors is 12%.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on March 1, 2022.

By: /s/ Daniel L. Steinberg  
Daniel L. Steinberg, OSB #993690

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## CERTIFICATE OF SERVICE

I hereby certify that on the date shown below, I served a true and correct copy of the foregoing DECLARATION OF DANIEL STEINBERG IN SUPPORT OF LOGAN PARTIES EMERGENCY MOTION TO CONTINUE HEARING ON DEBTORS' JOINT MOTION TO OBTAIN CREDIT on:

**VIA ECF:**

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DATED this 1<sup>st</sup> day of March, 2022.

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